

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: §
§
WATSON GRINDING & § CASE NO. 20-30967
MANUFACTURING CO., §
§
§
Debtor. § (Chapter 11)

SALVADOR SANTANA, §
§
Plaintiffs, §
§
v. §
§
WATSON GRINDING AND § ADVERSARY NO. _____
MANUFACTURING CO., WATSON §
VALVE SERVICES, INC., KMHJ §
MANAGEMENT COMPANY, LLC, §
KMHJ, LTD., WESTERN §
INTERNATIONAL GAS & §
CYLINDERS, INC., AND §
MATHESON TRI-GAS, INC., §
§
Defendants. §

NOTICE OF REMOVAL

Watson Grinding & Manufacturing Co. (the “Debtor”) files this Notice of Removal of the state court action styled *Salvador Santana v. Watson Grinding and Manufacturing Co., Watson Valve Services, Inc., KMHJ Management Company, LLC, KMHJ, Ltd., Western International Gas & Cylinders, Inc., and Matheson Tri-Gas, Inc.*, Cause No. 2020-38123, pending in the 269th Judicial District Court of Harris County, Texas (the “State Court Action”).

I. Procedural Background and Nature of Suit

1. On June 25, 2020, Salvador Santana (the “Plaintiff”) filed an Original Petition and Jury Demand (the “Original Petition”) against Watson Grinding & Manufacturing Co., Watson Valve Services, Inc., KMHJ Management Company, LLC, KMHJ, Ltd., Western International Gas & Cylinders, Inc., and Matheson Tri-Gas, Inc. (collectively, the “Defendants”). In his Original Petition, the Plaintiff asserts claims of negligence, gross negligence and negligent trespass against the Defendants.

2. On February 6, 2020 (the “Petition Date”), the Debtor filed its Voluntary Petition under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”), commencing the bankruptcy case captioned *In re Watson Grinding & Manufacturing Co.*, Case No. 20-30967, pending in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Chapter 11 Bankruptcy Case”).

II. Basis for Removal

3. This Notice of Removal is filed pursuant to 28 U.S.C. § 1452, Bankruptcy Rule 9027, and Local Bankruptcy Rules 9027-1, 9027-2, 9027-3, and the *General Order of Reference* entered by the District Court of this District on March 10, 2005.

4. The State Court Action was initiated after the commencement of the Chapter 11 Case. This Notice of Removal has been timely filed pursuant to Bankruptcy Rule 9027(a)(2). *In re R.E. Loans, LLC*, No. 11-35865, 2012 WL 3262767, at *2 (Bankr. S.D. Tex. Aug. 8, 2012).

5. Venue in this Court is proper pursuant to 28 U.S.C. § 1409.

6. Cases subject to jurisdiction are removable under the authority of 28 U.S.C. § 1452(a) (“A party may remove any claim or cause of action...to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title”). The State Court Action, including all claims and causes of action asserted

therein, is a civil action other than a proceeding before the United States Tax Court. The State Court Action is not a civil action by a government unit to enforce such government unit's police or regulatory power.

7. This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1334(b) (federal district courts have "original jurisdiction of all civil proceedings...arising in or related to cases under title 11"). The State Court Action "arises in" or, alternatively, is "related to" a Title 11 case, *i.e.* the Debtor's Chapter 11 Bankruptcy Case. In this circuit, "related to" proceedings include any case whose outcome "could *conceivably* have any effect on the administration of the estate." *In re Wood*, 825 F.2d 90, 93 (5th Cir. 1987) (emphasis added); *In re Baudoin*, 981 F.2d 736, 740 (5th Cir. 1993).

8. The resolution of this State Court Action will have a direct impact on the bankruptcy estate of the Debtor. The State Court Action is related to the Debtor's Chapter 11 Bankruptcy Case because the outcome of State Court Action could conceivably change the Debtor's rights, liabilities, or options in a way that would have an effect upon the handling and administration of the bankruptcy estate.

9. Thus, the claims asserted in the State Court Action are claims that arise in or are otherwise related to the Debtor's Chapter 11 Case pursuant to 28 U.S.C. § 1334(b), and removal to this Court is proper pursuant to 28 U.S.C. § 1452(a).

III. Core or Non-Core Bankruptcy Jurisdiction

10. This action involves the administration of the Debtor's estate and is a proceeding affecting the adjustment of the debtor-creditor relationship; it is, therefore, a core proceeding under 28 U.S.C. § 157(b)(2)(A)(B)(C) and (O). The claims and causes of action in the State Court Action have a clear and direct impact on the interests and property of the Debtor's estate under 11 U.S.C. § 541.

11. Upon removal of the State Court Action, the Debtor consents to the entry of final orders or judgment by the bankruptcy judge.

IV. Parties and Notice

12. Pursuant to 28 U.S.C. § 1452(a), Federal Bankruptcy Rule 9027(b), and Local Rule 9027-1, all adverse parties are being provided with a copy of this Notice of Removal and a copy of this Notice of Removal is being filed with the clerk of the 269th Judicial District Court of Harris County, Texas.

13. In accordance with Local Rule 9027-1(a), the names and addresses of the parties and counsel in the State Court Action, who have or will be served with the notice, are as follows:

Clark, Love & Hutson, PLLC
Ana M. Ene
440 Louisiana Street, Suite 1700
Houston, Texas 77002

ATTORNEYS FOR PLAINTIFF

V. Process and Pleadings

14. Pursuant to Bankruptcy Rule 9027(a)(1) and Local Bankruptcy Rule 9027-1(b), true and correct copies of all process and pleadings filed in the State Court Action (as set forth in the attached Exhibit “A”) have been provided to this Court.

15. In the State Court Action, citations were requested on June 25, 2020, on all the Defendants. No citations have been issued.

16. In accordance with Bankruptcy Rule 9027(c), the Debtor will promptly file a notice of the filing of this Notice of Removal in the State Court Action.

WHEREFORE, the Debtor notifies the United States Bankruptcy Court for the Southern District of Texas, Houston Division, that the State Court Action is hereby removed in its entirety to this Court pursuant to 28 U.S.C. § 1452(a) and Bankruptcy Rule 9027.

Dated: June 29, 2020.

Respectfully submitted,

JONES MURRAY & BEATTY, LLP

By: /s/ Ruth Van Meter
Erin E. Jones
Texas Bar No. 24032478
Ruth Van Meter
Texas Bar No. 20661570
4119 Montrose Blvd, Suite 230
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PROPOSED SPECIAL COUNSEL FOR JANET S. NORTHRUP, CHAPTER 11 TRUSTEE OF THE ESTATE OF WATSON GRINDING & MANUFACTURING CO.

AND

HUGHESWATTERASKANASE, LLP

By: /s/ Wayne Kitchens
Wayne Kitchens
Texas Bar No. 11541110
Heather McIntyre
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wkitchens@hwa.com
hmcintyre@hwa.com

PROPOSED COUNSEL FOR JANET S. NORTHRUP, CHAPTER 11 TRUSTEE OF WATSON GRINDING & MANUFACTURING CO.

AND

McCOY LEAVITT LASKEY LLC

By: /s/ Michael I. Ramirez

Michael I. Ramirez

Texas Bar No. 24008604

20726 Stone Oak Parkway, Suite 116

San Antonio, TX 78258

Telephone (210) 446-2828

Fax (262) 522-7020

mramirez@mlllaw.com

**COUNSEL FOR WATSON GRINDING &
MANUFACTURING CO.**

CERTIFICATE OF SERVICE

I certify that on June 29, 2020, a true and correct copy of the foregoing Notice was served via ECF/PACER to all parties registered to receive such service and on June 30, 2020, via first class mail (without attachments) to the following:

Clark, Love & Hutson, PLLC
Ana M. Ene
440 Louisiana Street, Suite 1700
Houston, Texas 77002

ATTORNEYS FOR PLAINTIFF

/s/ Ruth Van Meter

Ruth Van Meter

EXHIBIT A

2020-38123

COURT: 269th

FILED DATE: 6/25/2020

CASE TYPE: Other Injury or Damage



SANTANA, SALVADOR

Attorney: ENE, ANA MARIA

VS.

WATSON GRINDING AND MANUFACTURING CO

Docket Sheet Entries

Date	Comment
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CAUSE NO. _____

SALVADOR SANTANA,

PLAINTIFF,

vs.

WATSON GRINDING AND
MANUFACTURING CO.,
WATSON VALVE SERVICES, INC.,
KMHJ MANAGEMENT COMPANY, LLC,
KMHJ, LTD., WESTERN
INTERNATIONAL GAS & CYLINDERS,
INC., AND MATHESON TRI-GAS, INC.

DEFENDANTS.

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

_____ JUDICIAL DISTRICT

JURY TRIAL DEMANDED**PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Salvador Santana files this Original Petition against Defendants Watson Grinding and Manufacturing Co., Watson Valve Services, Inc., KMHJ Management Company, LLC, KMHJ, LTD., Western International Gas & Cylinders, Inc. and Matheson Tri-Gas-Inc.(collectively "Defendants") and, in support of his causes of action, would respectfully show the Court the following:

I.
DISCOVERY CONTROL PLAN

1. Because this case involves complex issues that requires extensive discovery, Plaintiff will ask the Court to enter an order that discovery should be conducted in accordance with

a level 3 discovery plan that is tailored to the particular circumstance of this case, in accordance with Rule 190 of the Texas Rule of Civil Procedure.

II.
PARTIES

2. Plaintiff Salvadore Santana is a Texas resident who resides in Harris County.
3. Defendant Watson Grinding and Manufacturing Co. is a domestic company engaged in business in the State of Texas. Watson Grinding and Manufacturing Co. regularly conducts business in a systematic and continuous manner in Texas and may be served with by certified mail, return receipt requested, through its registered agent: John M. Watson, 4525 Gessner Road, Houston, Texas 77041.
4. Defendant Watson Valve Services, Inc. is a domestic for-profit corporation doing business in the State of Texas. Defendant's principal place of business is located in Harris County, Texas. Defendant may be served through its registered agent: John M. Watson, 4525 Gessner Road, Houston, Texas 77041.
5. Defendant KMHJ Management Company, LLC is a domestic limited liability company registered to do business in the State of Texas, whose managing member is a resident of Harris County, Texas. Defendant may be served through its registered agent, Kelly Lee Watson, at 1400 McKinney Street, Suite 1212, Houston, Texas 77010 or wherever it may be found.
6. Defendant KMHJ, LTD. Is a domestic limited partnership registered to do business in Texas whose general partner is a resident of Harris County, Texas. Defendant may be served through its registered agent, KMHJ Management Company, LLC, at 1400 McKinney Street, Suite 1212, Houston, Texas 77010 or wherever it may be found.
7. Defendant Western International Gas & Cylinders, Inc. is a domestic for-profit corporation incorporated under the laws of the State of Texas with its principal place of business

in Houston, Harris County, Texas. Defendant may be served through its registered agent, Ms. Denise C. Haugen, at 7173 Highway 159 East, Bellville, Texas 77418 or wherever he may be found.

8. Defendant Matheson Tri-Gas, Inc., is a domestic for-profit corporation incorporated under the laws of the State of Texas and operating in Texas. Defendant may be served through its registered agent, CT Corporation Services, at 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

9. Plaintiff specifically invokes the right to institute this suit against whatever entity was conducting business using the assumed or common name of Watson Grinding and Manufacturing Co. regarding the events described in this Petition. Plaintiff invokes the right under Rule 28 of the Texas Rules of Civil Procedure to have the true name of this party substituted later upon the motion of any party or of the court.

III.
JURISDICTION AND VENUE

10. This court has subject matter jurisdiction of this cause of action because it involves an amount in controversy in excess of the minimum jurisdictional limits of this Court.

11. Venue is proper in Harris County under Tex. Civ. Prac. & Rem. Code § 15.002(a)(1), because all or a substantial all the events or omissions giving rise to this lawsuit occurred in Harris County. In addition, Plaintiff's property is in Harris County, the loss and damages at issue occurred in Harris County, the Defendants' conduct that caused all of Plaintiff's injuries occurred in Harris County, and the Defendants maintain its principal place of business in Harris County.

12. The damages sought are within the jurisdictional limits of this court. Plaintiff currently seeks monetary relief over \$200,000 but not more than 1,000,000, including damages of any kind, penalties, costs, expenses, and pre- and post-judgment interest.

IV.
FACTUAL BACKGROUND

13. In the early morning hours on January 24, 2020, at around 4:30 a.m., a massive explosion occurred at the Watson facility, resulting in causalties and significant damage to the surrounding homes and businesses. The explosion was felt and heard for miles in every direction and left a debris field that stretched almost a half-mile from the explosion site. The gas that was allegedly involved in the explosion was propylene, a dangerous and hazardous fuel gas that is highly flammable.

14. Plaintiff's property located at 10311 Rockcrest Rd, in the immediate vecinity of the Watson facility. Because Plaintiff's home was close to the explosion site, it took a direct hit from the explosion. Plaintiff's home was significantly and permanently damaged by the explosion.

15. The damages sustained include but are not limited to: broken windows, damaged garage door, cracked and damaged stucco, broken doors, framing and structural damages, cracked sheetrock, damaged staircase, electrical damages, personal property damages, etc. These damages were all caused by the explosion at Defendants' manufacturing facility. Significant and costly repairs will be required to bring the property in its pre-loss condition.

V.
CAUSES OF ACTION

NEGLIGENCE

16. At all material times, Defendants were under a duty to exercise reasonable or ordinary care in the operation and management of their manufacturing facility. More specifically,

Defendants were under a duty to exercise ordinary care, meaning that degree of care that would be used by a similar company under the same or similar circumstances, to refrain from negligent conduct that would cause explosions resulting in injuries to individuals in the area and damage to the surrounding property.

17. Defendants knew or should have known that the acts and omissions described in this petition could result in damage to surrounding property and the individuals living inside those homes.

18. Defendants failed to exercise reasonable or ordinary care in managing its facility and operations to ensure that the explosion did not occur, and thereby breaching its duties to the Plaintiff.

19. Defendants failed to exercise reasonable and ordinary care when conducting its business and breached its duty to the Plaintiff, including but not limited to one or more of the following ways:

- a. In failing to properly store, maintain, inspect, supervise or otherwise control the operation of its manufacturing facility;
- b. Failing to safely and properly contain and store dangerous materials, such that they are adequately protected from explosions;
- c. Failing to provide adequate equipment, competent personnel and training to its employees;
- d. Failing to create, promulgate, implement or enforce safety rules and guidelines pertaining to the safe operation of its facility;
- e. Failing to have adequate procedures or contingencies in place to protect the safety of the community in the event of an explosion;

f. Failing to warn of known hazards;

20. Each of these acts and omissions, singularly or in combination, constitute negligence which was the proximate cause of the explosion and Plaintiff's injuries.

21. At all-times material hereto, all the agents and employees for Defendants who were connected in any way with the explosion were acting within the course and scope of their employment or official duties and in furtherance of their employment. These agents and employees were acting in a managerial capacity or as vice-principals, and the acts committed by them were authorized, approved, and ratified by Defendants.

22. As a result of the explosion caused by Defendants, Plaintiff suffered economic injuries and permanent damage to their property.

GROSS NEGLIGENCE

23. Plaintiff re-alleges each and every aforementioned allegation. Plaintiff will further show that the acts and/or omissions of the Defendants, when viewed objectively, involve an extreme degree of risk considering the probability and magnitude of the potential harm to others. Defendants had actual and/or constructive knowledge of the facts and circumstances leading up to the explosion and knew that their failure to exercise reasonable care would cause significant losses to the citizens surrounding its building.

24. Defendants' actions and inactions were grossly negligent, reckless, willful and/or wanton. Defendants had actual subjective awareness of the risks involved in their operations, but nevertheless proceeded in conscious indifference to the rights, safety, and/or welfare of others, including the Plaintiff. Therefore, Plaintiff prays that punitive damages be awarded against Defendants. Plaintiff would show that nothing Plaintiff did, or failed to do, in any way contributed to this incident.

NEGLIGENT TRESPASS

25. Plaintiff will further show that Defendants' negligence in causing the explosion also caused a trespass to Plaintiffs' real and personal property.

26. The Defendants' negligence caused a significant interference or lack of possession of Plaintiff's possessory interest in his real and personal property. The Defendants' negligence and ultimate trespass is depriving the Plaintiff of the use of his property, which appears to be for a substantial period.

VI. **REQUEST FOR DISCLOSURES**

27. Pursuant to Tex. R. Civ. P. 194.2, Defendants are requested to disclose within fifty days after service of this request, the information and materials described in Rule 194.2(a)-(l).

VII. **JURY DEMAND**

28. Plaintiff hereby requests that all causes of action alleged herein be tried before a jury of citizens residing in Harris County, Texas, and concurrently tender the appropriate jury fee with the filing of this petition.

VIII. **PRAYER**

29. For these reasons, Plaintiff asks that the Defendants be cited to appear and answer and be held liable for the following:

- a. For money damages in an amount to be determined by a jury;
- b. Real property and personal property damages;
- c. Mental anguish in the past and future;
- d. Exemplary and punitive damages;

- e. Prejudgment and post judgment interest;
- f. Costs of suit;
- g. All other relief, in law or in equity, to which the Plaintiff may be justly entitled.

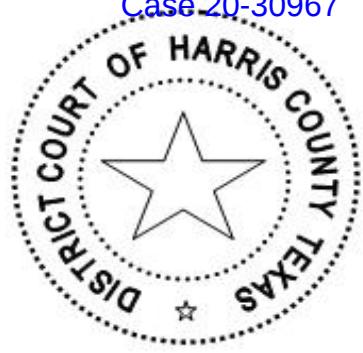
Dated: June 25, 2020

RESPECTFULLY SUBMITTED,

CLARK, LOVE & HUTSON, PLLC

/s/ Ana Ene

Ana M. Ene
State Bar No. 24076368
aene@triallawfirm.com
Adam D. Peavy, of counsel
adam@peavy-law.com
State Bar No. 24029766
Scott A. Love
slove@triallawfirm.com
Texas Bar No. 24002495
440 Louisiana Street, Suite 1700
Houston, Texas 77002
(713) 757-1400 (tel.)
(713) 759-1217 (fax)



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91081278 Total Pages: 8

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

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Request for Issuance of Service

CASE NUMBER: _____

CURRENT COURT: _____

Name(s) of Documents to be served: Plaintiffs' Original Petition _____

FILE DATE: _____ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: KMHJ, LTD _____

Address of Service: 1400 McKinney Street, Ste. 1212 _____

City, State & Zip: Houston, TX 77010 _____

Agent (if applicable) KMHJ Management Company, LLC _____

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

<input checked="" type="checkbox"/> Citation	<input type="checkbox"/> Citation by Posting	<input type="checkbox"/> Citation by Publication	<input type="checkbox"/> Citations Rule 106 Service
<input type="checkbox"/> Citation Scire Facias		<u>Newspaper</u> _____	
<input type="checkbox"/> Temporary Restraining Order		<input type="checkbox"/> Precept	<input type="checkbox"/> Notice
<input type="checkbox"/> Protective Order			
<input type="checkbox"/> Secretary of State Citation (\$12.00)		<input type="checkbox"/> Capias (not by E-Issuance)	<input type="checkbox"/> Attachment (not by E-Issuance)
<input type="checkbox"/> Certiorari		<input type="checkbox"/> Highway Commission (\$12.00)	
<input type="checkbox"/> Commissioner of Insurance (\$12.00)		<input type="checkbox"/> Hague Convention (\$16.00)	<input type="checkbox"/> Garnishment
<input type="checkbox"/> Habeas Corpus (not by E-Issuance)		<input type="checkbox"/> Injunction	<input type="checkbox"/> Sequestration
<input type="checkbox"/> Subpoena			
<input type="checkbox"/> Other (Please Describe) _____			

(See additional Forms for Post Judgment Service)

SERVICE BY (check one):

<input type="checkbox"/> ATTORNEY PICK-UP (phone) _____	<input checked="" type="checkbox"/> E-Issuance by District Clerk (No Service Copy Fees Charged)
<input type="checkbox"/> MAIL to attorney at: _____	<i>Note:</i> The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents.
<input type="checkbox"/> CONSTABLE	
<input type="checkbox"/> CERTIFIED MAIL by District Clerk	Visit www.hcdistrictclerk.com for more instructions.
<input type="checkbox"/> CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____	Phone: _____
<input type="checkbox"/> OTHER, explain _____	

Issuance of Service Requested By: Attorney/Party Name: Ana M. Ene Bar # or ID 24076368 _____

Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002 _____

Phone Number: 713-757-1400 _____



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91081279 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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HARRIS COUNTY DISTRICT CLERK

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6/25/2020 4:26:21 PM
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Harris County
Envelope No: 44052003
By: SALGADO, CAROLINA
Filed: 6/25/2020 4:26:21 PM

Request for Issuance of Service

CASE NUMBER: _____

CURRENT COURT: _____

Name(s) of Documents to be served: Plaintiffs' Original Petition _____

FILE DATE: _____ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: KMHJ Management Company, LLC _____

Address of Service: 1400 McKinney Street, Ste. 1212 _____

City, State & Zip: Houston, TX 77010 _____

Agent (if applicable): Kelly Lee Watson _____

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

<input checked="" type="checkbox"/> Citation	<input type="checkbox"/> Citation by Posting	<input type="checkbox"/> Citation by Publication	<input type="checkbox"/> Citations Rule 106 Service
<input type="checkbox"/> Citation Scire Facias		Newspaper _____	
<input type="checkbox"/> Temporary Restraining Order		<input type="checkbox"/> Precept	<input type="checkbox"/> Notice
<input type="checkbox"/> Protective Order			
<input type="checkbox"/> Secretary of State Citation (\$12.00)		<input type="checkbox"/> Capias (not by E-Issuance)	<input type="checkbox"/> Attachment (not by E-Issuance)
<input type="checkbox"/> Certiorari		<input type="checkbox"/> Highway Commission (\$12.00)	
<input type="checkbox"/> Commissioner of Insurance (\$12.00)		<input type="checkbox"/> Hague Convention (\$16.00)	<input type="checkbox"/> Garnishment
<input type="checkbox"/> Habeas Corpus (not by E-Issuance)		<input type="checkbox"/> Injunction	<input type="checkbox"/> Sequestration
<input type="checkbox"/> Subpoena			
<input type="checkbox"/> Other (Please Describe) _____			

(See additional Forms for Post Judgment Service)

SERVICE BY (check one):

ATTORNEY PICK-UP (phone) _____

E-Issuance by District Clerk

(No Service Copy Fees Charged)

Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents. Visit www.hcdistrictclerk.com for more instructions.

CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____

OTHER, explain _____

Issuance of Service Requested By: Attorney/Party Name: Ana M. Ene Bar # or ID 24076368 _____

Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002 _____

Phone Number: 713-757-1400 _____



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91081280 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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6/25/2020 4:26:21 PM
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Harris County
Envelope No: 44052003
By: SALGADO, CAROLINA
Filed: 6/25/2020 4:26:21 PM

Request for Issuance of Service

CASE NUMBER: _____

CURRENT COURT: _____

Name(s) of Documents to be served: Plaintiffs' Original Petition _____

FILE DATE: _____ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Matheson Tri-Gas, Inc. _____

Address of Service: 1999 Bryan Street, Ste. 900 _____

City, State & Zip: Dallas, TX 75201 _____

Agent (if applicable) CT Corporation Service _____

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

<input checked="" type="checkbox"/> Citation	<input type="checkbox"/> Citation by Posting	<input type="checkbox"/> Citation by Publication	<input type="checkbox"/> Citations Rule 106 Service
<input type="checkbox"/> Citation Scire Facias		<u>Newspaper</u> _____	
<input type="checkbox"/> Temporary Restraining Order		<input type="checkbox"/> Precept	<input type="checkbox"/> Notice
<input type="checkbox"/> Protective Order			
<input type="checkbox"/> Secretary of State Citation (\$12.00)		<input type="checkbox"/> Capias (not by E-Issuance)	<input type="checkbox"/> Attachment (not by E-Issuance)
<input type="checkbox"/> Certiorari		<input type="checkbox"/> Highway Commission (\$12.00)	
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<input type="checkbox"/> Habeas Corpus (not by E-Issuance)		<input type="checkbox"/> Injunction	<input type="checkbox"/> Sequestration
<input type="checkbox"/> Subpoena			
<input type="checkbox"/> Other (Please Describe) _____			

(See additional Forms for Post Judgment Service)

SERVICE BY (check one):

ATTORNEY PICK-UP (phone) _____

MAIL to attorney at: _____

CONSTABLE

CERTIFIED MAIL by District Clerk

E-Issuance by District Clerk
(No Service Copy Fees Charged)

Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents. Visit www.hcdistrictclerk.com for more instructions.

CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____

OTHER, explain _____

Issuance of Service Requested By: Attorney/Party Name: Ana M. Ene Bar # or ID 24076368 _____

Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002 _____

Phone Number: 713-757-1400 _____



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91081281 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

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Request for Issuance of Service

CASE NUMBER: _____

CURRENT COURT: _____

Name(s) of Documents to be served: Plaintiffs' Original Petition _____

FILE DATE: _____ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Watson Grinding and Manufacturing Co. _____Address of Service: 4525 Gessner Road _____City, State & Zip: Houston, TX 77041 _____Agent (if applicable) John M. Watson _____

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

<input checked="" type="checkbox"/> Citation	<input type="checkbox"/> Citation by Posting	<input type="checkbox"/> Citation by Publication	<input type="checkbox"/> Citations Rule 106 Service
<input type="checkbox"/> Citation Scire Facias		<u>Newspaper</u> _____	
<input type="checkbox"/> Temporary Restraining Order		<input type="checkbox"/> Precept	<input type="checkbox"/> Notice
<input type="checkbox"/> Protective Order			
<input type="checkbox"/> Secretary of State Citation (\$12.00)		<input type="checkbox"/> Capias (not by E-Issuance)	<input type="checkbox"/> Attachment (not by E-Issuance)
<input type="checkbox"/> Certiorari		<input type="checkbox"/> Highway Commission (\$12.00)	
<input type="checkbox"/> Commissioner of Insurance (\$12.00)		<input type="checkbox"/> Hague Convention (\$16.00)	<input type="checkbox"/> Garnishment
<input type="checkbox"/> Habeas Corpus (not by E-Issuance)		<input type="checkbox"/> Injunction	<input type="checkbox"/> Sequestration
<input type="checkbox"/> Subpoena			
<input type="checkbox"/> Other (Please Describe) _____			

(See additional Forms for Post Judgment Service)

SERVICE BY (check one):

ATTORNEY PICK-UP (phone) _____

MAIL to attorney at: _____

CONSTABLE

CERTIFIED MAIL by District Clerk

E-Issuance by District Clerk
(No Service Copy Fees Charged)

Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents. Visit www.hcdistrictclerk.com for more instructions.

CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____

OTHER, explain _____

Issuance of Service Requested By: Attorney/Party Name: Ana M. Ene Bar # or ID 24076368 _____Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002 _____Phone Number: 713-757-1400 _____



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91081282 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

In accordance with Texas Government Code 406.013 electronically transmitted authenticated documents are valid. If there is a question regarding the validity of this document and or seal please e-mail support@hcdistrictclerk.com



Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-327-5800 | www.hcdistrictclerk.com

6/25/2020 4:26:21 PM
Marilyn Burgess - District Clerk
Harris County
Envelope No: 44052003
By: SALGADO, CAROLINA
Filed: 6/25/2020 4:26:21 PM

Request for Issuance of Service

CASE NUMBER: _____

CURRENT COURT: _____

Name(s) of Documents to be served: Plaintiffs' Original Petition _____

FILE DATE: _____ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Watson Valve Services, Inc. _____

Address of Service: 4525 Gessner Road _____

City, State & Zip: Houston, TX 77041 _____

Agent (if applicable) John M. Watson _____

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

<input checked="" type="checkbox"/> Citation	<input type="checkbox"/> Citation by Posting	<input type="checkbox"/> Citation by Publication	<input type="checkbox"/> Citations Rule 106 Service
<input type="checkbox"/> Citation Scire Facias		Newspaper _____	
<input type="checkbox"/> Temporary Restraining Order		<input type="checkbox"/> Precept	<input type="checkbox"/> Notice
<input type="checkbox"/> Protective Order			
<input type="checkbox"/> Secretary of State Citation (\$12.00)		<input type="checkbox"/> Capias (not by E-Issuance)	<input type="checkbox"/> Attachment (not by E-Issuance)
<input type="checkbox"/> Certiorari		<input type="checkbox"/> Highway Commission (\$12.00)	
<input type="checkbox"/> Commissioner of Insurance (\$12.00)		<input type="checkbox"/> Hague Convention (\$16.00)	<input type="checkbox"/> Garnishment
<input type="checkbox"/> Habeas Corpus (not by E-Issuance)		<input type="checkbox"/> Injunction	<input type="checkbox"/> Sequestration
<input type="checkbox"/> Subpoena			
<input type="checkbox"/> Other (Please Describe) _____			

(See additional Forms for Post Judgment Service)

SERVICE BY (check one):

ATTORNEY PICK-UP (phone) _____

E-Issuance by District Clerk
(No Service Copy Fees Charged)

Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents. Visit www.hcdistrictclerk.com for more instructions.

CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____

OTHER, explain _____

Issuance of Service Requested By: Attorney/Party Name: Ana M. Ene Bar # or ID 24076368 _____

Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002 _____

Phone Number: 713-757-1400 _____



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91081283 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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Marilyn Burgess

HARRIS COUNTY DISTRICT CLERK

201 Caroline | P.O. Box 4651 | Houston, Texas 77210-4651 | 832-327-5800 | www.hcdistrictclerk.com

6/25/2020 4:26:21 PM
Marilyn Burgess - District Clerk
Harris County
Envelope No: 44052003
By: SALGADO, CAROLINA
Filed: 6/25/2020 4:26:21 PM

Request for Issuance of Service

CASE NUMBER: _____

CURRENT COURT: _____

Name(s) of Documents to be served: Plaintiffs' Original Petition _____

FILE DATE: _____ Month/Day/Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

Issue Service to: Western International Gas & Cylinders, Inc. _____

Address of Service: 7173 Highway 159 East _____

City, State & Zip: Bellville, Texas 77418 _____

Agent (if applicable) Denise C. Haugen _____

TYPE OF SERVICE/PROCESS TO BE ISSUED: (Check the proper Box)

<input checked="" type="checkbox"/> Citation	<input type="checkbox"/> Citation by Posting	<input type="checkbox"/> Citation by Publication	<input type="checkbox"/> Citations Rule 106 Service
<input type="checkbox"/> Citation Scire Facias		Newspaper _____	
<input type="checkbox"/> Temporary Restraining Order		<input type="checkbox"/> Precept	<input type="checkbox"/> Notice
<input type="checkbox"/> Protective Order			
<input type="checkbox"/> Secretary of State Citation (\$12.00)		<input type="checkbox"/> Capias (not by E-Issuance)	<input type="checkbox"/> Attachment (not by E-Issuance)
<input type="checkbox"/> Certiorari		<input type="checkbox"/> Highway Commission (\$12.00)	
<input type="checkbox"/> Commissioner of Insurance (\$12.00)		<input type="checkbox"/> Hague Convention (\$16.00)	<input type="checkbox"/> Garnishment
<input type="checkbox"/> Habeas Corpus (not by E-Issuance)		<input type="checkbox"/> Injunction	<input type="checkbox"/> Sequestration
<input type="checkbox"/> Subpoena			
<input type="checkbox"/> Other (Please Describe) _____			

(See additional Forms for Post Judgment Service)

SERVICE BY (check one):

ATTORNEY PICK-UP (phone) _____

E-Issuance by District Clerk

(No Service Copy Fees Charged)

Note: The email registered with EfileTexas.gov must be used to retrieve the E-Issuance Service Documents. Visit www.hcdistrictclerk.com for more instructions.

CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____ Phone: _____

OTHER, explain _____

Issuance of Service Requested By: Attorney/Party Name: Ana M. Ene Bar # or ID 24076368 _____

Mailing Address: 440 Louisiana, Ste. 1700, Houston, TX 77002 _____

Phone Number: 713-757-1400 _____



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this June 26, 2020

Certified Document Number: 91081284 Total Pages: 1

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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